

BUTZEL LONG, a professional corporation  
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UNITED STATES BANKRUPTCY COURT  
SOUTHERN DISTRICT OF NEW YORK

In re	)	Chapter 11
DPH HOLDINGS CORP., <i>et al.</i> ,	)	Case No. 05-44481 (RDD)
	)	Jointly Administered
Reorganized Debtors.	)	

**DECLARATION OF DEAN R. UNRUE, CLAIMS ADMINISTRATOR, IN SUPPORT  
OF REORGANIZED DEBTORS' MOTION FOR ORDER (I) ENFORCING  
MODIFICATION PROCEDURES ORDER, MODIFIED PLAN AND PLAN  
MODIFICATION ORDER INJUNCTIONS AGAINST TRUSTEE FOR THE  
OLDCO M DISTRIBUTION TRUST, AND (II) DIRECTING TRUSTEE  
TO DISMISS ACTION TO RECOVER DISCHARGED CLAIM**

I, DEAN R. UNRUE, state as follows:

1. I am over eighteen years of age and not a party to the above-captioned cases. I believe the statements contained herein are true based on my personal knowledge.
2. I am the Claims Administrator for the Reorganized Debtors and my business address is 5725 Delphi Drive, M/C 483-400-525, Troy, MI 48098-2815. This Declaration is based upon my personal knowledge, except as to such matters as are stated upon information and belief.

3. On or before June 20, 2009, Delphi served copies of the (a) Notice of Approval of Supplement; (b) Notice of Hearing on Modifications to Plan; (c) Notice of Deadline and Procedures for Filing Objections to Modifications of Plan; (d) Notice of Deadline and Procedures for Temporary Allowance of Certain Claims for Voting Purposes; (e) Notice of Treatment of Certain Unliquidated, Contingent, or Disputed Claims for Noticing, Voting, and Distribution Purposes; (f) Notice of Record Date; (g) Notice of Voting Deadline for Receipt of Ballots; (h) Notice of Proposed Releases, Exculpation, and Injunction in Modified Plan ("Final Modification Hearing Notice"); and (i) Notice of Bar Date for Filing Proofs of Administrative Expense and Administrative Expense Claim Form on Metaldyne Corporation ("Metaldyne"), at various of its locations or upon its counsel of record, by first class U.S. mail, all as fully disclosed in the Affidavit of Service of Evan Gershbein, dated June 23, 2009 (Doc 17267).

4. Metaldyne, or any affiliate that has the name "Metaldyne" in it, did not file proof of an administrative expense claim on an Administrative Expense Claim Form by the July 15, 2009 Administrative Expense Bar Date; nor is there any record of Metaldyne or any such affiliate filing proof of an administrative expense claim after the Administrative Expense Bar Date in these reorganization proceedings.

5. To the best of my knowledge, information and belief, I hereby declare and state that the foregoing information is true and correct.

Executed on August 30, 2011, at Troy, Michigan

  
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DEAN R. UNRUE